

United States District Court
District of Massachusetts

Todd W. Williams

Civil Action

v.

Guy W. Glodis

No.

05-40149 FDS

Complaint

Parties

1. The plaintiff is confined at the Worcester County Jail and House of Correction, West Boylston, Massachusetts by Superintendent Guy W. Glodis, and is a resident of United States.
2. The defendant Guy W. Glodis is the Superintendent of the Worcester County Jail and House of Correction, a resident of West Boylston, and a citizen of the United States.

Jurisdiction

3. This court has jurisdiction over this matter pursuant to 42 U. S. C. section 1983

Facts

- 4 The plaintiff has Posttraumatic Stress Disorders, Bipolar and Anxiety, which requires Cognitive and Behavioral psychotherapy.
5. The plaintiff was admitted to the Worcester County Jail and House of Correction in January 2005. On May 24, 2005 he was placed on suicide watch because he was crying. On May 27, 2005 plaintiff was observed rolling up a sheet in an attempted suicide. On June 4, 2005 officers of the Worcester County Jail and House of Correction cut the plaintiff down after he hung himself.
- 6 Plaintiff has a history of placement on suicide watch, and is at immense risk for imminent and longterm suicide.
- 7 The plaintiff is currently in administrative segregation and on suicide watch in the Maximum Security Unit at the jail.

8. The plaintiff is presenting with significant symptoms of a mental illness. They include depressed mood, restricted affect, impaired sleep, command auditory hallucinations, suicidal thoughts and impaired insight and judgement.
9. The plaintiff is not getting any better but is instead worsening without proper treatment and habilitation.
10. The Fourteenth Amendment equal protection clause is relied upon to support the plaintiff's right to adequate medical care, including psychiatric care, services, treatment and habilitation.
11. The plaintiff's right to adequate psychiatric care, services, treatment and habilitation is derived from the common law duty of care owed by the defendant.
12. A low doctor/inmate ratio, and understaffing of non-medical personnel at the Worcester County Jail and House of Correction deprives the plaintiff of adequate services, care, treatment and habilitation.

13. Where the plaintiff is being confined in administrative segregation and on suicide watch he is being deprived adequate care, treatment and habilitation.

14. At the Worcester County Jail and House of Correction the Plaintiff will be deprived of care, treatment and habilitation for his mental illness.

15. Plaintiff's continued confinement at the Worcester County Jail and House of Correction is improper, unnecessary and clinically inappropriate.

16. The plaintiff's classification prohibits him from receiving adequate care, services, treatment and habilitation.

17. The plaintiff should be transferred forthwith to a facility where he can receive adequate psychiatric care, treatment and habilitation.

18 Plaintiff's transfer is necessary to allow him to receive special psychological and psychiatric treatment and habilitation.

19. Wherefore the plaintiff demands judgement against the defendant for damages and such other relief as the court deems just.

20. The plaintiff demands a trial by jury

Todd W. Williams
Todd W. Williams
5 Paul X. Tiernan Dr.
West Boylston, MA
01583

CIVIL COVER SHEET

05-40149

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Todd W. Williams

DEFENDANTS

Guy, Jr. Gladis

(b) County of Residence of First Listed Plaintiff Worcester
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Worcester
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number)

Todd W. Williams
5 Paul X. Tripp Dr.
West Boylston, MA
01583

Attorneys (If Known)

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

G1 U.S. Government Plaintiff G3 Federal Question (U.S. Government Not a Party)

G2 U.S. Government Defendant G4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(Place an "X" in One Box for (For Diversity Cases Only) and One Box for Defendant)

	PTF	DEF	PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> G1	<input checked="" type="checkbox"/> G1	<input checked="" type="checkbox"/> G4	<input checked="" type="checkbox"/> G4
Citizen of Another State	<input checked="" type="checkbox"/> G2	<input checked="" type="checkbox"/> G2	<input checked="" type="checkbox"/> G5	<input checked="" type="checkbox"/> G5
Citizen or Subject of a Foreign Country	<input checked="" type="checkbox"/> G3	<input checked="" type="checkbox"/> G3	<input checked="" type="checkbox"/> G6	<input checked="" type="checkbox"/> G6

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input checked="" type="checkbox"/> G110 Insurance	<input checked="" type="checkbox"/> 310 Air Line	<input checked="" type="checkbox"/> 362 Personal Injury—Med. Malpractice	<input checked="" type="checkbox"/> 422 Appeal 28 USC 158	<input checked="" type="checkbox"/> 400 State Reapportionment
<input checked="" type="checkbox"/> G120 Marine	<input checked="" type="checkbox"/> 315 Airplane Product Liability	<input checked="" type="checkbox"/> 365 Personal Injury—Product Liability	<input checked="" type="checkbox"/> 423 Withdrawal 28 USC 157	<input checked="" type="checkbox"/> 410 Antitrust
<input checked="" type="checkbox"/> G130 Miller Act	<input checked="" type="checkbox"/> 320 Assault, Libel & Slander	<input checked="" type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input checked="" type="checkbox"/> 430 Banks and Banking	<input checked="" type="checkbox"/> 420 Deportation
<input checked="" type="checkbox"/> G140 Negotiable Instrument	<input checked="" type="checkbox"/> 330 Federal Employers' Liability	<input checked="" type="checkbox"/> 370 Other Fraud	<input checked="" type="checkbox"/> 450 Commerce/ICC Rates/etc.	<input checked="" type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input checked="" type="checkbox"/> G150 Recovery of Overpayment & Enforcement of Judgment	<input checked="" type="checkbox"/> 340 Marine Product Liability	<input checked="" type="checkbox"/> 371 Truth in Lending	<input checked="" type="checkbox"/> 480 Copyrights	<input checked="" type="checkbox"/> 810 Selective Service
<input checked="" type="checkbox"/> G151 Medicare Act	<input checked="" type="checkbox"/> 345 Marine Product Liability	<input checked="" type="checkbox"/> 380 Other Personal Property Damage	<input checked="" type="checkbox"/> 830 Patent	<input checked="" type="checkbox"/> 850 Securities/Commodities/ Exchange
<input checked="" type="checkbox"/> G152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input checked="" type="checkbox"/> 350 Motor Vehicle	<input checked="" type="checkbox"/> 385 Product Damage	<input checked="" type="checkbox"/> 840 Trademark	<input checked="" type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input checked="" type="checkbox"/> G153 Recovery of Overpayment of Veteran's Benefits	<input checked="" type="checkbox"/> 355 Motor Vehicle Product Liability	<input checked="" type="checkbox"/> 390 Other Product Liability	<input checked="" type="checkbox"/> 861 HIA (1395ff)	<input checked="" type="checkbox"/> 891 Agricultural Acts
<input checked="" type="checkbox"/> G160 Stockholders' Suits	<input checked="" type="checkbox"/> 360 Other Personal Injury	<input checked="" type="checkbox"/> 710 Fair Labor Standards Act	<input checked="" type="checkbox"/> 862 Black Lung (923)	<input checked="" type="checkbox"/> 892 Economic Stabilization Act
<input checked="" type="checkbox"/> G190 Other Contract		<input checked="" type="checkbox"/> 720 Labor/Mgmt. Relations	<input checked="" type="checkbox"/> 863 DIWC/DIWW (405(g))	<input checked="" type="checkbox"/> 893 Environmental Matters
<input checked="" type="checkbox"/> G195 Contract Product Liability		<input checked="" type="checkbox"/> 730 Labor/Mgmt Reporting & Disclosure Act	<input checked="" type="checkbox"/> 864 SSID Title XVI	<input checked="" type="checkbox"/> 894 Energy Allocation Act
		<input checked="" type="checkbox"/> 740 Railway Labor Act	<input checked="" type="checkbox"/> 865 RSI (405(g))	<input checked="" type="checkbox"/> 895 Freedom of Information Act
		<input checked="" type="checkbox"/> 790 Other Labor Litigation		<input checked="" type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
		<input checked="" type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input checked="" type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input checked="" type="checkbox"/> 950 Constitutionality of State Statutes
			<input checked="" type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input checked="" type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		
<input checked="" type="checkbox"/> G210 Land Condemnation	<input checked="" type="checkbox"/> 411 Voting	<input checked="" type="checkbox"/> 510 Motions to Vacate Sentence		
<input checked="" type="checkbox"/> G220 Foreclosure	<input checked="" type="checkbox"/> 412 Empl. Payment	<input checked="" type="checkbox"/> 520 Habeas Corpus: General		
<input checked="" type="checkbox"/> G230 Rent Lease & Ejectment	<input checked="" type="checkbox"/> 413 Housing/ Accommodations	<input checked="" type="checkbox"/> 535 Death Penalty		
<input checked="" type="checkbox"/> G240 Torts to Land	<input checked="" type="checkbox"/> 414 Welfare	<input checked="" type="checkbox"/> 540 Mandamus & Other		
<input checked="" type="checkbox"/> G245 Tort Product Liability	<input checked="" type="checkbox"/> 416 Civil or Civil Rights	<input checked="" type="checkbox"/> 550 Civil Rights		
<input checked="" type="checkbox"/> G290 All Other Real Property		<input checked="" type="checkbox"/> 555 Prison Condition		

V. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

G1 Original Proceeding G2 Removed from State Court G3 Remanded from Appellate Court G4 Reinstated or G5 Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

(Check the U.S. Civil Statute under which you are filing and write brief statement of cause.)

(Do not cite jurisdictional statutes unless diversity.)

U.S. Code 42 sec. 1983 Failure to provide adequate treatment and rehabilitation

VII. REQUESTED IN COMPLAINT:

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

VIII. RELATED CASE(S)

(See instructions):

IF ANY

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OR PRO se

Todd Williams

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IPP

JUDGE

MAG. JUDGE

05-40149

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS1. TITLE OF CASE (NAME OF FIRST PARTY ON EACH SIDE ONLY) Todd W. Williams v. Gary W. Goldis

2. CATEGORY IN WHICH THE CASE BELONGS BASED UPON THE NUMBERED NATURE OF SUIT CODE LISTED ON THE CIVIL COVER SHEET. (SEE LOCAL RULE 40.1(A)(1)).

I. 160, 410, 470, R.23, REGARDLESS OF NATURE OF SUIT.

II. 195, 368, 400, 440, 441-444, 540, 550, 555, 625, 710, 720, 730, 740, 790, 791, 820*, 830*, 840*, 850, 890, 892-894, 895, 950.

III. 110, 120, 130, 140, 151, 190, 210, 230, 240, 245, 290, 310, 315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 370, 371, 380, 385, 450, 891.

IV. 220, 422, 423, 430, 460, 510, 530, 610, 620, 630, 640, 650, 660, 690, 810, 861-865, 870, 871, 875, 900.

V. 150, 152, 153.

* Also complete AO 120 or AO 121
for patent, trademark or copyright cases

3. TITLE AND NUMBER, IF ANY, OF RELATED CASES. (SEE LOCAL RULE 40.1(E)).

4. HAS A PRIOR ACTION BETWEEN THE SAME PARTIES AND BASED ON THE SAME CLAIM EVER BEEN FILED IN THIS COURT?

YES NO

5. DOES THE COMPLAINT IN THIS CASE QUESTION THE CONSTITUTIONALITY OF AN ACT OF CONGRESS AFFECTING THE PUBLIC

INTEREST? (SEE 28 USC 2403) YES NO

IF SO, IS THE U.S.A. OR AN OFFICER, AGENT OR EMPLOYEE OF THE U.S. A PARTY?

YES NO

6. IS THIS CASE REQUIRED TO BE HEARD AND DETERMINED BY A DISTRICT COURT OF THREE JUDGES PURSUANT TO TITLE 28 USC 2284?

YES NO 7. DO ALL PARTIES IN THIS ACTION RESIDE IN THE CENTRAL DIVISION OF THE DISTRICT OF MASSACHUSETTS (WORCESTERCOUNTY) - (SEE LOCAL RULE 40.1(C)). YES NO OR IN THE WESTERN DIVISION (BERKSHIRE, FRANKLIN, HAMDEN OR HAMPSHIRE COUNTIES)? (SEE LOCAL RULE 40.1(D)).YES NO 8. DO ALL OF THE PARTIES RESIDING IN MASSACHUSETTS RESIDE IN THE CENTRAL AND/OR WESTERN DIVISIONS OF THE DISTRICT?YES NO (a) IF YES, IN WHICH DIVISION DOES THE PLAINTIFF RESIDE? Central9. IN WHICH DIVISION DO THE ONLY PARTIES RESIDING IN MASSACHUSETTS RESIDE? Central

10. IF ANY OF THE PARTIES ARE THE UNITED STATES, COMMONWEALTH OF MASSACHUSETTS, OR ANY GOVERNMENTAL AGENCY OF THE U.S.A. OR THE COMMONWEALTH, DO ALL OTHER PARTIES RESIDE IN THE

CENTRAL DIVISION; YES NO OR WESTERN DIVISION; YES NO

11. ALTERNATIVE DISPUTE RESOLUTION - IS THIS CASE SUITABLE FOR ADR? IF SO, BY WHICH ADR?

EARLY NEUTRAL EVALUATION MEDIATION SUMMARY JURY/BENCH TRIAL MINI-TRIAL OTHER

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME Todd W. WilliamsADDRESS 5 Paul X. Tivarus Dr. West Boylston, MA. 01583

TELEPHONE NO. _____